Postal Regulatory Commission Submitted 10/17/2011 3:55:40 PM Filing ID: 76773 Accepted 10/17/2011

BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268–0001

RATE ADJUSTMENT DUE TO EXTRAORDINARY OR EXCEPTIONAL CIRCUMSTANCES

Docket No. R2010-4R

UNITED STATES POSTAL SERVICE MOTION FOR LEAVE TO RESPOND TO OPPOSITION AND RESPONSE TO ITS REQUEST FOR A STAY (October 17, 2011)

The United States Postal Service hereby moves for permission to respond to the Opposition of Alliance of Nonprofit Mailers, American Business Media, Direct Marketing Association, Inc., and Magazine Publishers of America, Inc., to USPS Motion to Stay, filed on October 7, 2011, and to the Response of Public Representative to Motion of the United States Postal Service to Stay its Request for Exigent Relief, filed on October 11, 2011. The Postal Service believes that the record would benefit from submission of the Postal Service's response and that no party would suffer harm thereby.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

R. Andrew German Managing Counsel, Legal Strategy

Kevin A. Calamoneri Managing Counsel, Corporate & Postal Business Law

Nabeel R. Cheema

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-7178, FAX: -5402 October 17, 2011